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October 5, 2022

VIA ECF

Honorable Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Courtroom 619
New York, NY 10007

MEMO ENDORSED, page 2

Re: *Ernest Moore v. Nelson Management Group, Ltd., et al.*,
Case No. 1:22-cv-03515 (ER)

Dear Judge Ramos:

This firm represents the Defendants in the above-referenced action.

Pursuant to Sections 1.A and 1.E of Your Honor's Individual Rules and Practices, we respectfully seek a three-week extension of time for the parties to file their settlement agreement and joint submissions with the Court for fairness review pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015), from the current deadline of Wednesday, October 5, until Wednesday, October 26.

This is the first application for an extension of the submission deadline, directed by this Court in an Order entered September 14. See Dkt. No. 14. The parties have conferred and Plaintiff's counsel consents to the application. No other dates or deadlines would be affected by the request.

Defendants are currently reviewing draft settlement paperwork that would memorialize and give effect to the parties' agreement. While Defendants expect that any negotiations concerning the settlement paperwork will be quickly completed, the undersigned is out of the office the remainder of this week and all of the following week, returning Monday, October 17.

We thank the Court for its consideration of this request.

Respectfully Submitted,

CLIFTON BUDD & DEMARIA, LLP
Attorneys for Defendants

By:  Stephen P. Pischl | Counsel

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The parties' request for an extension of time to submit a settlement agreement for the Court's approval pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015) from October 5, 2022 to October 26, 2022 is GRANTED. It is SO ORDERED.

cc: **VIA ECF**

ABDUL HASSAN LAW GROUP, PLLC
Attorneys for the Plaintiffs



Edgardo Ramos, U.S.D.J

Dated: October 5, 2022

New York, New York